

Honorable James L. Robart

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MICROSOFT CORPORATION, a
Washington corporation,

Plaintiff,

v.

JOHN DOES 1-20 d/b/a/ "Testking",

Defendants.

No. CV06-1116JLR

DECLARATION OF
DAVID A. BATEMAN

I, David Bateman, hereby declare as follows:

1. I am attorney of record for Microsoft in this matter. I am over the age of eighteen, have personal knowledge of the matters set forth herein, and am competent to testify thereto.

2. Attached hereto as Exhibit 1 is a true and correct copy of the <testking.com> home page, which appears at the URL <http://www.testking.com>.

3. Attached hereto as Exhibit 2 is a true and correct copy of web page that appears at the URL <http://www.testking.com/About-Us.htm>.

4. Attached hereto as Exhibit 3 is a true and correct copy of the first page of the results of a search for the terms "Testking" and "Microsoft" using the MSN Internet search

DECLARATION OF
DAVID A. BATEMAN - 1
Case No. . CV06-1116JLR

K:\00103\02908\CTV\CTV_P20LX

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TELEPHONE: (206) 623-7580
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1 engine.

2 5. Attached hereto as Exhibit 4 is a true and correct copy of the publicly available
3 whois record for <testking.com>.

4 6. Attached hereto as Exhibit 5 are true and correct copies of the home page and
5 publicly available whois record for the domain name <123cert.com>.

6 7. Attached hereto as Exhibit 6 are true and correct copies of the home page and
7 publicly available whois record for the domain name <actual-exams.com>.

8 8. Attached hereto as Exhibit 7 are true and correct copies of the home page and
9 publicly available whois record for the domain name <braindumpcentral.com>.

10 9. Attached hereto as Exhibit 8 are true and correct copies of the home page and
11 publicly available whois record for the domain name <braindumps.com>.

12 10. Attached hereto as Exhibit 9 are true and correct copies of the home page and
13 publicly available whois record for the domain name <braindumps.net>.

14 11. Attached hereto as Exhibit 10 are true and correct copies of the home page and
15 publicly available whois record for the domain name <braindumps-central.com>.

16 12. Attached hereto as Exhibit 11 are true and correct copies of the home page and
17 publicly available whois record for the domain name <braindumpsinfo.com>.

18 13. Attached hereto as Exhibit 12 are true and correct copies of the home page and
19 publicly available whois record for the domain name <braindumpsmail.com>.

20 14. Attached hereto as Exhibit 13 are true and correct copies of the home page and
21 publicly available whois record for the domain name <braindumps-tutorial.com>.

22 15. Attached hereto as Exhibit 14 are true and correct copies of the home page and
23 publicly available whois record for the domain name <certguide.com>.

24 16. Attached hereto as Exhibit 15 are true and correct copies of the home page and
25 publicly available whois record for the domain name <certheaven.com>.

26
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DAVID A. BATEMAN - 2
Case No. . CV06-1116JLR

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1 17. Attached hereto as Exhibit 16 are true and correct copies of the home page and
2 publicly available whois record for the domain name <certhq.com>.

3 18. Attached hereto as Exhibit 17 are true and correct copies of the home page and
4 publicly available whois record for the domain name <certification-offer.com>.

5 19. Attached hereto as Exhibit 18 are true and correct copies of the home page and
6 publicly available whois record for the domain name <certification-online-program.com>.

7 20. Attached hereto as Exhibit 19 are true and correct copies of the home page and
8 publicly available whois record for the domain name <certification-paper.com>.

9 21. Attached hereto as Exhibit 20 are true and correct copies of the home page and
10 publicly available whois record for the domain name <certification-portal.com>.

11 22. Attached hereto as Exhibit 21 are true and correct copies of the home page and
12 publicly available whois record for the domain name <certifyexpress.com>.

13 23. Attached hereto as Exhibit 22 are true and correct copies of the home page and
14 publicly available whois record for the domain name <certyourself.com>.

15 24. Attached hereto as Exhibit 23 are true and correct copies of the home page and
16 publicly available whois record for the domain name <cram4exams.com>.

17 25. Attached hereto as Exhibit 24 are true and correct copies of the home page and
18 publicly available whois record for the domain name <exact-exams.com>.

19 26. Attached hereto as Exhibit 25 are true and correct copies of the home page and
20 publicly available whois record for the domain name <exactquestions.com>.

21 27. Attached hereto as Exhibit 26 are true and correct copies of the home page and
22 publicly available whois record for the domain name <mcsebraindumps.com>.

23 28. Attached hereto as Exhibit 27 are true and correct copies of the home page and
24 publicly available whois record for the domain name <mcseguide.com>.

25 29. Attached hereto as Exhibit 28 are true and correct copies of the home page and
26

DECLARATION OF
DAVID A. BATEMAN - 3
Case No. . CV06-1116JLR

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1 publicly available whois record for the domain name <microsoft-braindumps.com>.

2 30. Attached hereto as Exhibit 29 are true and correct copies of the home page and
3 publicly available whois record for the domain name <microsoft-training-exam.com>.

4 31. Attached hereto as Exhibit 30 are true and correct copies of the home page and
5 publicly available whois record for the domain name <perfect-braindumps.com>.

6 32. Attached hereto as Exhibit 31 are true and correct copies of the home page and
7 publicly available whois record for the domain name <questions-central.com>.

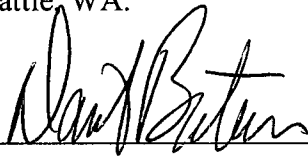
8 33. Attached hereto as Exhibit 32 are true and correct copies of the home page and
9 publicly available whois record for the domain name <real-exams.com>.

10 34. Attached hereto as Exhibit 33 are true and correct copies of the home page and
11 publicly available whois record for the domain name <studyguide-testking.com>.

12 35. Attached hereto as Exhibit 34 are true and correct copies of the home page and
13 publicly available whois record for the domain name <training-test-paper.com>.

14 I declare under penalty of perjury that the foregoing is true and correct:

15 EXECUTED this 15th day of August, 2006 at Seattle, WA.



16
17 
18

19 David A. Bateman
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DECLARATION OF
DAVID A. BATEMAN - 4
Case No. . CV06-1116JLR

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
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
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
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
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


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Rank	Cert Name	Value Pack
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Cisco		
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1	Specialist	Available
2	CCNA - Cisco Certified Network Associate	Available
3	IP Communications	Available
4	CCIE - Cisco Certified Internetwork Expert	Available
5	CCNP - Cisco Certified Network Professional	Available
6	Wireless LAN	Available
7	CCSP - Cisco Certified Security Professional	Available
8	CCVP - Cisco Certified Voice Professional	Available
9	Sales - Sales Expert	Available
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11	CCIP - Cisco Certified Internetwork Professional	Available
12	CCDA - Cisco Certified Design Associate	Available

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642-143 350-030
642-104 642-586
646-227 640-801
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- Citrix
1Y0-223 1Y0-613
- CompTIA
220-301 N10-003
220-302
- EMC
E20-597 E22-181
- Exam Express
EE0-021 EE0-065
EE0-503 EE0-505
- Exin
EX0-100
- HP
HP0-427
- Hyperion
4H0-028 4H0-533
- IBM
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000-703 000-071
000-078 000-222
- Microsoft
70-536 70-528
70-551 70-552
70-553 70-554
70-282 70-529
70-549 70-089
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MB7-227 MB4-211
MB4-212 MB4-213
MB4-217 MB4-218
MB4-219 MB4-348
MB4-349 MB5-554

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Veritas			
VMware			
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	2	CCA 4.0	70-293
 FAQ	3	CCIA - Citrix Certified Integration Architect	MB2-185
	4	CCA 3.0 - Citrix Certified Administrator 3.0	MB3-208
 GUARANTEE	Rank	Cert Name	MB3-234
	1	A+	MB3-461
 TESTIMONIALS	2	Network+	MB3-465
	3	Security+	MB5-199
 RESELLER			MB5-292
			MB6-283
			MB6-285
 NEW RELEASES	Rank	Cert Name	MB6-288
	1	Technology Foundations	Nortel
 MOST POPULAR			920-161
			OMG
			UM0-200
 HOT PRODUCTS			Oracle
			1z0-001
			1z0-024
			1z0-026
			1z0-101
			1z0-132
			1z0-147
			SAS Institute
			A00-206
			Sun
			310-330
			310-615
			310-878
			310-015
			Sybase
			510-309
			TIA
			TT0-101
 HOT CERTIFICATIONS	Rank	Cert Name	
	1	ASE - Accredited Systems Engineer	Checkpoint
	2	AIS - Accredited Integration Specialist	CCSE
			Cisco
			CCSP
			CCNA
			CCIE
			CCDA
			Citrix
			CCEA XP
			CompTIA
			Security+
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 Cisco	Rank	Cert Name	
	1	ASE - Accredited Systems Engineer	CCSA
	2	AIS - Accredited Integration Specialist	CCNP
			CCIP
			CCDP
 IBM	Rank	Cert Name	
	1	Certified Specialist	
	2	Certified Advanced Technical Expert	
	3	Systems Expert	
 ISC	Rank	Cert Name	
	1	CISSP	
 Juniper	Rank	Cert Name	
	1	JNCIA	

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HP0-683	Lotus			
ISC				ISC
CISSP				CISSP
Microsoft				Microsoft
70-228	70-229	1	CLP	Value Pack Available
70-270	70-271			
70-272	70-282			
70-284	70-285			
70-290	70-291			
70-292	70-293	1	MCSE - Microsoft Certified System Engineer	Value Pack Available
70-294	70-296	2	MCSE 2003 - Microsoft Certified Systems Engineer 2003	Value Pack Available
70-297	70-298	3	MCSE 2003 Messaging - Microsoft Certified Systems Engineer 2003 Messaging	Value Pack Available
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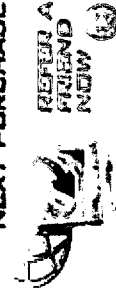


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
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1z0-132 1z0-140

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310-878 310-879

310-015

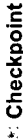
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 **Cisco**

CCSP CCNP

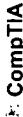
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CCIE CCDP

CCDA

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CCEA XP

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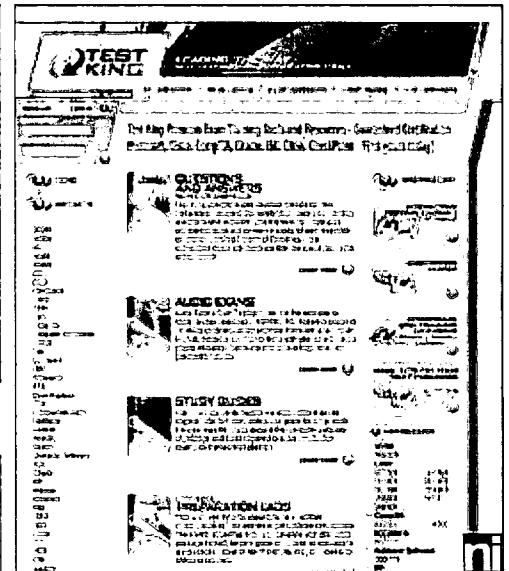
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Alexa Trend/Rank: 34,359 (1 Month) 34,840 (3 Month)

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Yahoo Directory: [Software](#)

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Domain History

We have recorded 260 Whois changes for testking.com since 2003-05-31. View them with our [Domain History](#) tool.

Server Data

Server Type: Microsoft-IIS/5.0

IP Address: 64.106.243.104

IP Location: - New Jersey - Edgewater - Datapipe

Response Code: 200

Blacklist Status: Clear ([history](#))

Monitor

Watch this domain for changes using our [Monitor Tool](#).

Backorder

Set a [backorder](#) so you can own testking.com when it becomes available.

SSL Cert: No valid SSL on this Host**Website Status:** Active**Registry Data****ICANN Registrar:** ENOM, INC.**Created:** 05-Dec-2001**Expires:** 05-Dec-2006**Registrar Status:** REGISTRAR-LOCK**Whois Server:** whois.enom.com**Name Server:** DNS1.NAME-SERVICES.COM**Whois History:** 260 records have been archived**Whois Record**

=-----

Domain name: testking.com

Registrant Contact:

Whois Privacy Protection Service, Inc.

Whois Agent (blnrotxsck@whoisprivacyprotect.com)

+1.4252740657

Fax: +1.4256960234

PMB 368, 14150 NE 20th St - F1

C/O testking.com

Bellevue, WA 98007

US

Administrative Contact:

Whois Privacy Protection Service, Inc.

Whois Agent (blnrotxsck@whoisprivacyprotect.com)

+1.4252740657

Fax: +1.4256960234

PMB 368, 14150 NE 20th St - F1

C/O testking.com

Bellevue, WA 98007

US

Technical Contact:

Whois Privacy Protection Service, Inc.

Whois Agent (blnrotxsck@whoisprivacyprotect.com)

+1.4252740657

Fax: +1.4256960234

PMB 368, 14150 NE 20th St - F1

C/O testking.com

Bellevue, WA 98007

US

Status: Locked

Name Servers:

dns1.name-services.com

dns2.name-services.com

dns3.name-services.com

dns4.name-services.com

dns5.name-services.com

Creation date: 05 Dec 2001 12:25:59

Expiration date: 05 Dec 2006 12:25:59

=-----

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Domain	Price
AsiaKing.com	\$100.00
KingDons.com	\$150.00
EmailKing.com	\$395.00
PageKing.com	\$488.00
TeamKing.com	\$488.00
ZeroKing.com	\$488.00
CafeKing.com	\$500.00
HotKing.com	\$500.00
KingMusic.com	\$525.00
KingU.com	\$600.00
WorkKing.com	\$1,000.00

Domains At Auction

Domain	Auction Date
Yo-King.net	06-29-2006
BossBass.com	06-30-2006
BossRemover.com	06-30-2006
KingTable.com	06-30-2006
TheSuperKing.com	06-30-2006
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CarWaxKing.com	06-30-2006
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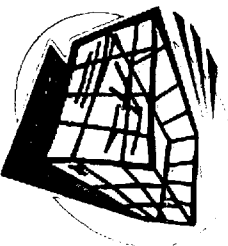
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Meta Keywords: MCSE, MCSE sample tests, MCSE practice exams, CISCO, CCNA, Braindump heaven, A+, A plus, networking, braindumps, network essentials, cramsession, FREE sample tests, novell, cne, netware, linux, msce, rampage, Microsoft Certified Systems Engineer

Indexed Data

Alexa Related 3 listings

Sites: [examsimulators.com](#), [certifyexpress.com](#), [audioexam.com](#),

Alexa Trend/Rank: 1,763,158 (1 Month) 3,329,326 (3 Month)

Server Data

Server Type: Microsoft-IIS/5.0

IP Address: 209.40.120.13

IP Location: - District Of Columbia - Washington - Hopone Internet Corporation

Response Code: 200

Blacklist Status: Clear ([history](#))

SSL Cert: No valid SSL on this Host

Website Status: Active

Reverse IP: [53 other sites](#) hosted on this server

Registry Data

ICANN Registrar: ENOM, INC.

Created: 09-Jan-2002

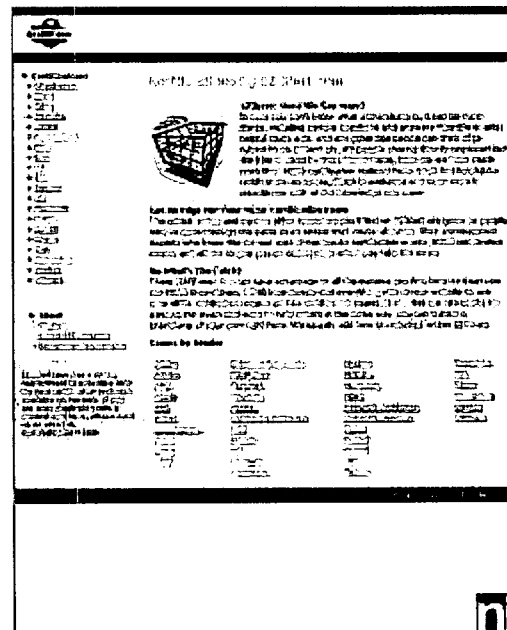
Expires: 09-Jan-2007

Registrar Status: REGISTRAR-LOCK

Whois Server: [whois.enom.com](#)

21

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.com	.net	.org	.info	.biz	.us
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Domain History

We have recorded 5 Whois changes for 123cert.com since 2004-10-21. View them with our [Domain History](#) tool.

Monitor

Watch this domain for changes using our [Monitor Tool](#).

Reverse IP

There are 53 other sites hosted on this

Whois History: 5 records have been archived**Whois Record**

=====

Registration Service Provided By: Certification Trendz
Contact: admin@testmatrix.net

Domain name: 123cert.com

Registrant Contact:

-
Ove Lundberg (admin@testmatrix.net)
706267479
Fax: none
Sernanders vag 9:516
Uppsala, 75262
SE

Administrative Contact:

Ruthy
Ruthy George (webmaster@braindumps.net)
+1.9783378048
Fax:
53 Third Avenue
Burlington, MA 01803
US

Technical Contact:

Ruthy
Ruthy George (webmaster@braindumps.net)
+1.9783378048
Fax:
53 Third Avenue
Burlington, MA 01803
US

Status: Locked

Name Servers:

dns1.name-services.com
dns2.name-services.com
dns3.name-services.com
dns4.name-services.com
dns5.name-services.com

Creation date: 09 Jan 2002 07:56:08

Expiration date: 09 Jan 2007 07:56:08

=====

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Domain	Price
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CertHelp.com	\$500.00
CertLab.com	\$500.00
CertTrack.com	\$500.00
CertSecurity.com	\$500.00
TrustCert.com	\$910.00
IntraCert.com	\$990.00
CyberCert.com	\$1,230.00
CertSource.com	\$1,230.00
SageCert.com	\$1,390.00

Domains At Auction

Domain	Auction Date
KentCountyCertTeam.com	06-24-2006
CertifiedAudio.com	06-25-2006
CertifiedGuru.com	06-25-2006
GifCert.com	06-25-2006
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Meta Description: MCSE Training, A+ Certification, CCNA, CISSP, CCNP Training, CCIE LAB Description: CCNA, A+ Certification, MCSE, CCNA Training and Certification Materials and many more.

Meta Keywords: Mcse, ccna, A+ Certification, MCSE Training, CCNA Certification, CCIE LAB, CCIE Training, CCIE Certification, MCSE Certification, CISSP, CCNP Training, CCNP Certification, CISSP Training, CISSP Certification, CCIE LAB Training.

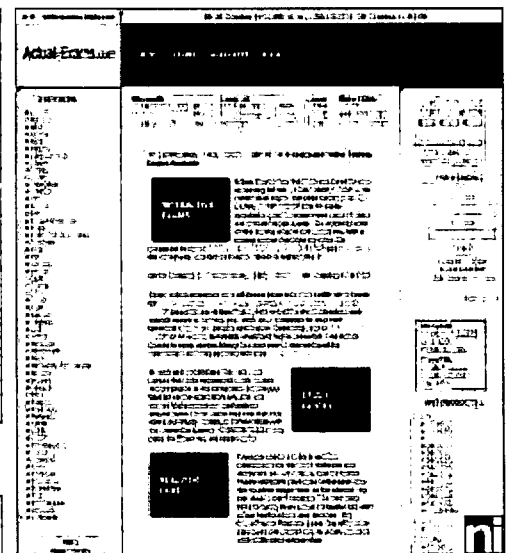
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Alexa Trend/Rank: 496,222 (1 Month) 350,761 (3 Month)

Server Data**IP Address:** 64.106.243.100 **IP Location:** - New Jersey - Edgewater - Datapipe**Response Code:** 500**Blacklist Status:** Clear ([history](#))**SSL Cert:** No valid SSL on this Host**Website Status:** Active**Registry Data****ICANN Registrar:** ENOM, INC.**Created:** 18-Aug-2002**Expires:** 18-Aug-2006**Registrar Status:** REGISTRAR-LOCK

27

Thumbnail: 2006-06-15**Other TLDs**[Show Key](#)

.com	.net	.org	.info	.biz	.us
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We have recorded 30 Whois changes for actual-exams.com since 2003-04-02. View them with our [Domain History](#) tool.

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Whois Server: whois.enom.com**Name Server:** DNS5.NAME-SERVICES.COM**Whois History:** 30 records have been archived**Whois Record**

=====

Domain name: actual-exams.com

Registrant Contact:

Whois Privacy Protection Service, Inc.

Whois Agent (tdqxwqkmdy@whoisprivacyprotect.com)

+1.4252740657

Fax: +1.4256960234

PMB 368, 14150 NE 20th St - F1

C/O actual-exams.com

Bellevue, WA 98007

US

Administrative Contact:

Whois Privacy Protection Service, Inc.

Whois Agent (tdqxwqkmdy@whoisprivacyprotect.com)

+1.4252740657

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Whois Agent (tdqxwqkmdy@whoisprivacyprotect.com)

+1.4252740657

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Status: Locked

Name Servers:

dns1.name-services.com

dns2.name-services.com

dns3.name-services.com

dns4.name-services.com

dns5.name-services.com

Creation date: 18 Aug 2002 16:42:50

Expiration date: 18 Aug 2006 16:42:50

=====

Domains for Sale

Domain	Price
FrenchExams.com	\$500.00
RectalExams.com	\$500.00
AudioExams.com	\$500.00
JobExams.com	\$548.00
MyExams.com	\$548.00
MockExams.com	\$800.00
TakingExams.com	\$850.00
AccountingExams.com	\$999.00
ExamsAsap.com	\$1,000.00
ExamsGuru.com	\$1,000.00
EssayExams.com	\$1,100.00

Domains At Auction

Domain	Auction Date
Talking-Exams.com	06-25-2006
ExamsExpress.com	06-26-2006
Mock-Exams.net	06-26-2006
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Meta Description: Brain Dump Central is the premiere resource for MCSE, MCSA, CNA and A+ certification. Our superior dump and display method easily make this the best dump on the web.

Meta Keywords: brain dump, mcse brain dump, mcse, mcsa, cna, a+, certification, windows 2000, oracle, novell, Microsoft, network, comptia, heaven, practice exams, study guides, certification, braindumpcentral, braindumpcentral.com

Indexed Data**DMOZ Directory:** BrainDump**DMOZ Title:** Brain Dump Central

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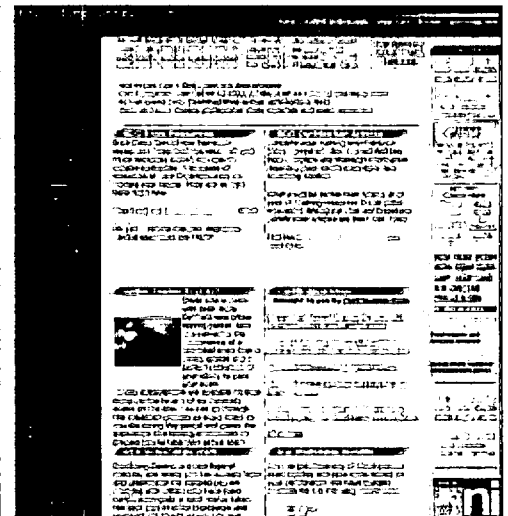
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Alexa Trend/Rank: 696,601 (1 Month) 414,751 (3 Month)

Server Data**Server Type:** Microsoft-IIS/5.0**IP Address:** 209.40.126.225

IP Location: - District Of Columbia - Washington - Hopone Internet Corporation

Response Code: 200**Blacklist Status:** Clear ([history](#))**SSL Cert:** No valid SSL on this Host**Website Status:** Active**Reverse IP:** [50 other sites](#) hosted on this server**Thumbnail: 2005-11-07**[Queue Thumbnail For Update](#)**Other TLDs**[Show Key](#)

.com	.net	.org	.info	.biz	.us
Ra	Ra	Ra	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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We have recorded 14 Whois changes for braindumpcentral.com since 2003-02-03. View them with our [Domain History](#) tool.

Monitor

Watch this domain for changes using our [Monitor Tool](#).

Reverse IP

There are 50 other sites hosted on this webserver. View a sample with [Reverse IP](#).

Registry Data

ICANN Registrar: ENOM, INC.
Created: 09-Apr-2001
Expires: 09-Apr-2010
Registrar Status: REGISTRAR-LOCK
Whois Server: whois.enom.com
Name Server: DNS5.NAME-SERVICES.COM
Whois History: [14 records](#) have been archived

Whois Record

=====

Registration Service Provided By: Certification Trendz
 Contact: admin@testmatrix.net

Domain name: braindumpcentral.com

Registrant Contact:

Ove Lundberg (admin@testmatrix.net)
 706267479
 Fax: none
 Sernanders vag 9:516
 Uppsala, 75262
 SE

Administrative Contact:

NA
 Braindump Central (info@braindumpcentral.com)
 +91.5555555555
 Fax:
 877, Adarsh Nagar
 Oshiwara, MR 50310
 IN

Technical Contact:

NA
 Braindump Central (info@braindumpcentral.com)
 +91.5555555555
 Fax:
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Status: Locked

Name Servers:

dns1.name-services.com
 dns2.name-services.com
 dns3.name-services.com
 dns4.name-services.com
 dns5.name-services.com

Creation date: 09 Apr 2001 14:49:40
 Expiration date: 09 Apr 2010 14:49:40
 =====

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Domain	Price
FtpDump.com	\$75.00
DumpDolls.com	\$105.00
DumpKins.com	\$110.00
WasteDump.com	\$500.00
SpaceDump.com	\$500.00
Dump.info	\$628.00
DumpI.com	\$753.00
ArticulatedDump.com	\$999.00
TownDump.com	\$1,000.00
DumpDomains.com	\$1,255.00
DataDump.com	\$1,888.00

Domains At Auction

Domain	Auction Date
DumpTheFat.com	06-25-2006
DropWeightNow.com	06-26-2006
TossSkateboard.com	06-26-2006
TheDropFood.com	06-26-2006
TossBoardShop.com	06-26-2006
InformDropMore.com	06-26-2006
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